



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



REBECCA A. HUMPHRIES
DIRECTOR

October 15, 2010



Mr. Michael Berkoff
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SRF-6J)
Chicago, Illinois 60604-3507

Dear Mr. Berkoff:

SUBJECT: Georgia-Pacific LLC Request to Consolidate Paper Residuals into the Willow Boulevard Landfill, Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, Operable Unit 2: Willow Boulevard/A-Site Landfills

The Michigan Department of Natural Resources and Environment (DNRE) has reviewed the Georgia-Pacific LLC (GP) request to consolidate paper waste residual into the Willow Boulevard Landfill as presented in the July 2010 Preliminary Design Report and October 12, 2010, Preliminary Design Report Addendum 1 – Response to USEPA/MDNRE Draft Comments (AD1).

As indicated in the September 2003 Record of Decision (ROD), all paper waste residuals are to be consolidated at the A-Site Landfill. As outlined in the AD1, GP is requesting to consolidate paper waste residuals excavated in the vicinity of the Willow Boulevard Landfill into the Willow Boulevard Landfill instead of the A-Site Landfill. Supporting rationale includes the following:

- Increased estimated volume of material to be removed from the Willow Boulevard Landfill and Willow Boulevard Drainageway (13,000 cubic yards) from the estimated volume presented in the November 2004 Remedial Investigation/Focused Feasibility Study (6,000 cubic yards);
- Work safety concerns related to two-way vehicular transport of excavated paper waste residuals in limited site distances and rough terrain and crossing the one-lane bridge over Olmstead Creek;
- Potential adverse environmental impacts related to active work at both landfills at the same time including storm water management issues, increased potential for leachate generation from storm water contacting paper waste residuals, and potential air transport of dust and polychlorinated biphenyls from additional truck traffic;
- Construction scheduling to conduct remedial actions at the Willow Boulevard Landfill and A-Site Landfill in sequential construction seasons and allow for remedial action work to be completed at the Willow Boulevard Landfill in one construction season; and
- Limiting the placement of additional temporary cover material to be imported to stabilize paper waste residuals from Willow Boulevard Drainageway over the 2011/2012 winter season. The temporary cover may not be recoverable and may result in additional fill volume in the A-Site Landfill.

The DNRE has reviewed the reasons and rationale provided by GP to support this request and has determined that the rationale provided does not provide sufficient technical merit for approval of the request for a change to the remedy as described in the ROD. There appears to

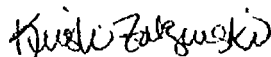
be sufficient available volume in the A-Site Landfill to accommodate the estimated amounts of paper waste materials and temporary cover materials necessary to stabilize the Willow Boulevard Landfill and Willow Boulevard Drainageway wastes throughout the winter season. Rationale related to worker safety, traffic management, storm water management, dust suppression, and choice of construction schedule are convenience requests to reduce possible or potential impacts as a result of the normal course of work for this site. Although the presented rationale is not of sufficient technical merit for approval, there are not sufficient technical reasons to deny the request either.

The Water Resources Division, Kalamazoo District Engineer was consulted to assess the impacts to the floodplain and floodway of the Kalamazoo River. The District Engineer indicated that the 100-year floodplain elevation at this location is estimated to be approximately 764.4 feet NAVD88 and the proposed modification to increase the cap elevation on the Willow Boulevard Landfill will not have detrimental effects on the floodplain storage or conveyance of the Kalamazoo River beyond that already being realized by the historic construction of these two disposal units. Noted assumptions included that the footprint of the work that is at or below the 100-year flood elevation of 764.4 feet NAVD88 is not changing. As this is a summary of the District Engineer's assessment, it does not constitute formal approval or acceptance of any work to be completed within the floodplain and floodway of the Kalamazoo River at this location by the District Engineer.

In conclusion, based on the lack of sufficient technical rationale to deny GP's request, the DNRE does not object to consolidation of paper waste residuals into Willow Boulevard Landfill. However, the DNRE recommends that the United States Environmental Protection Agency (USEPA) be aware that there may be significant public concern with this proposed change. Based on the past concerns presented by the public for paper waste residuals remaining in the Kalamazoo River floodplain, this type of change may cause additional public concern and upset.

The DNRE appreciates the opportunity to evaluate GP's request and looks forward to assisting the USEPA with this site in the future. If you have any questions regarding these comments, please contact me at your earliest convenience.

Sincerely,



Kristi Zakrzewski, P.E.
Project Manager
Specialized Sampling Unit
Superfund Section
Remediation Division
517-373-2937

cc: Mr. Jeff Keiser, CH2M Hill
Mr. Scott Hutsell, CH2M Hill
Mr. Pat McGuire, ARCADIS
Mr. Garry Griffith, Georgia-Pacific LLC
Ms. Daria W. Devantier, DNRE
Mr. James Heinzman, DNRE
Mr. John Bradley, DNRE
Mr. Ernest Sarkipato, DNRE